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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

Case No. CR-11-195 (HZ)

UNITED STATES of AMERICA,
Plaintiff,

v.

BLAKE DAVID HAMPE,
Defendant.

**MOTION TO TERMINATE
SUPERVISED RELEASE PURSUANT
TO 18 U.S.C. § 3583(e)**

COMES NOW, defendant, Blake David Hampe (“Hampe”), by and through his undersigned attorney, Ramón A. Pagán, hereby moves this Court for an order terminating his supervised release in the above-referenced matter pursuant to 18 U.S.C. § 3583(e).

This motion is based upon the following facts and circumstances:

1. Hampe pled guilty, on or about July 27, 2007, to a one count indictment alleging a violation of 18 U.S.C. § 2252A(a)(5)(b) and (b)(2), in the District of Maine before the Honorable District Judge John A. Woodcock.

2. Hampe was sentenced to 41 months imprisonment and 10 years supervised release by Judge Woodcock on May 16, 2008.
3. Hampe served his sentence of imprisonment, and was released to the custody of the United States Probation Office on May 13, 2010 (after calculations for time served, etc.).
4. On or about May 4, 2011, Hampe's matter was officially transferred to this Court's jurisdiction, which granted this Court authority to modify, revoke or terminate his supervised release. (see Exhibit A, Order dated 5/4/2011).
5. Hampe has fully complied with all requirements of his supervised release for the last 5 years, and has been active in seeking to improve his life and re-enter society. He has been an active participant in all of his treatment and program requirements. He has fully participated in all counseling, has attended college for vocational training, and now the biggest hurdle to his rehabilitation is the continued restrictions supervised release places on him. A more thorough description of his activities and compliance is available in the Affidavit of Blake David Hampe, Exhibit B to this Motion.
6. Counsel inquired of Jewelley Hirsch, Hampe's assigned probation officer, of what steps he would need to take before her office might consider consenting to the termination of his supervised release. Ms. Hirsch stated, months prior to the filing of this motion, that Hampe would need to complete his group therapy and would need to pass a full-disclosure polygraph. Hampe has now done both; he completed his group therapy successfully, and has been transferred to sessions for those who are finished

with group therapy, and he successfully passed his full-disclosure polygraph. A copy of the letter Ms. Hirsch sent me to this effect is attached as Exhibit C to this motion.

7. I understand that the USPO tends to object to any termination of supervised release in cases involving child pornography. But beyond that policy-based objection, I do not believe Hampe could do any more, for his part, to satisfy the USPO's concerns.
8. As the Court is well aware, the studies on recidivism among sex offenders, particularly those charged with child pornography crimes, like Mr. Hampe, have recently shown that there is a large gap between the public perception of the tendency to re-commit sex crimes and what the reality is for those within the criminal justice system. Attached as Exhibit D is an essay by Federal Defender Stabenow on the misperceptions associated with child pornography cases. Attached as Exhibit E is a recent study by the same doctors who created the sex offender risk assessment evaluations used by so many courts and probation officers that shows that recidivism rates among sex offenders dramatically decreases after the first post-conviction year.
9. Further, considering the nature of the actual offense in this case, as well as the Pre-Sentence Report, the sex-offender risk evaluations, and Hampe's extraordinary improvements over the last few years, he is a good candidate for early termination, and such termination would allow him to begin pursuing a career. Copies of Hampe's PSR and relevant evaluations have been submitted *under seal* as Exhibit F to protect his privacy interests.

10. The Court has the discretion to grant this motion, as demonstrated by the
Memorandum in Support, and it should use that discretion in this instance, as Mr.

Hampe is an ideal candidate for consideration of termination of supervised release.

DATED this 29th day of May, 2015.

THE LAW OFFICE OF RAMON A. PAGAN
Attorney for Petitioner

By: s/RAP

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